

Introducing Consumer-Driven Choice to Cable

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**Consumers
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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: MB Docket No. 04-207

Dear Ms. Dortch:

On Thursday, July 29, 2004, Gene Kimmelman of Consumers Union and I were asked to speak at the Symposium on "A La Carte" MVPD Pricing. I used a Powerpoint slidedeck with charts to explain the economic principles I outlined in my speech.

I trust you have a copy of the transcript, but to complete the record, attached is a copy of the slidedeck.

Respectfully submitted,

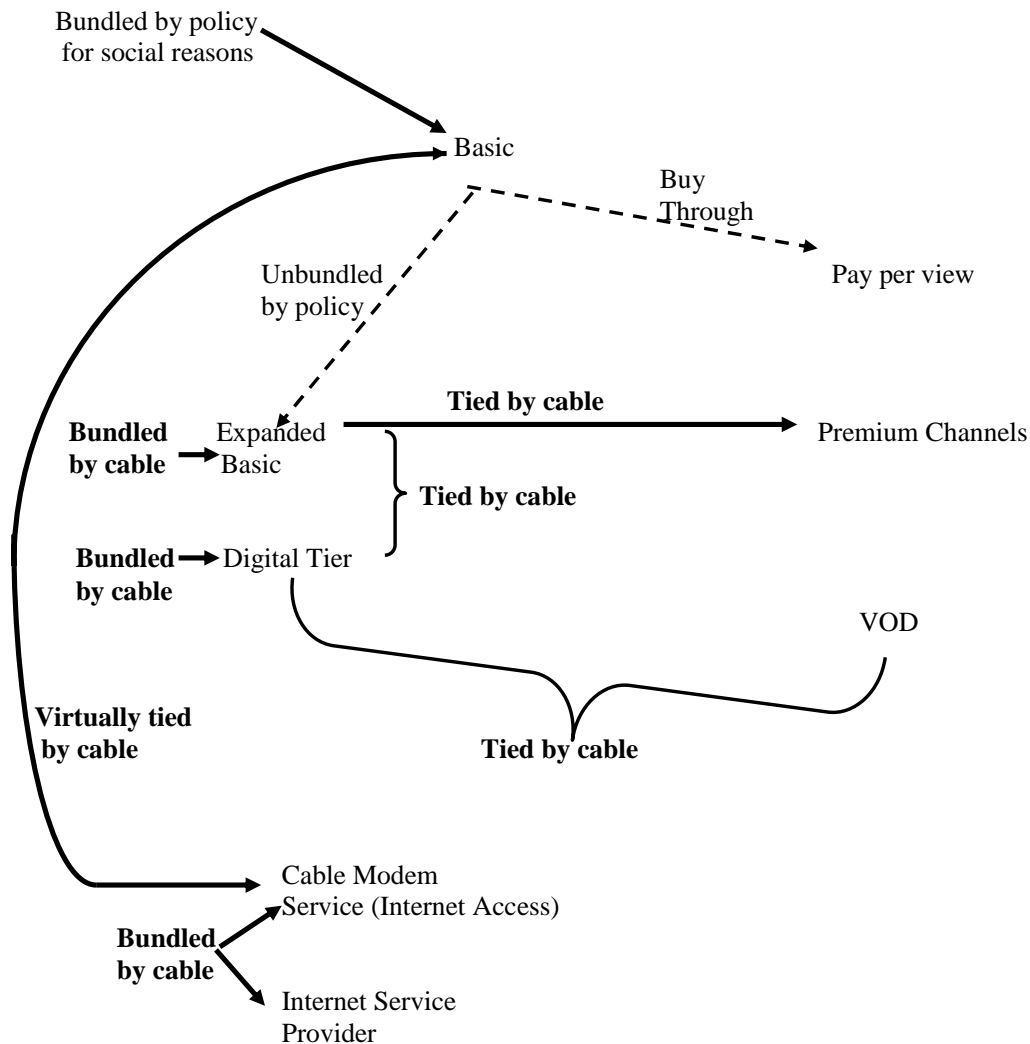
/s/ Mark Cooper
Mark Cooper

Enclosure

HOW THE CABLE INDUSTRY'S BUNDLES AND TIES CONTENT

BUNDLED & TIED SERVICES

A LA CARTE SERVICES



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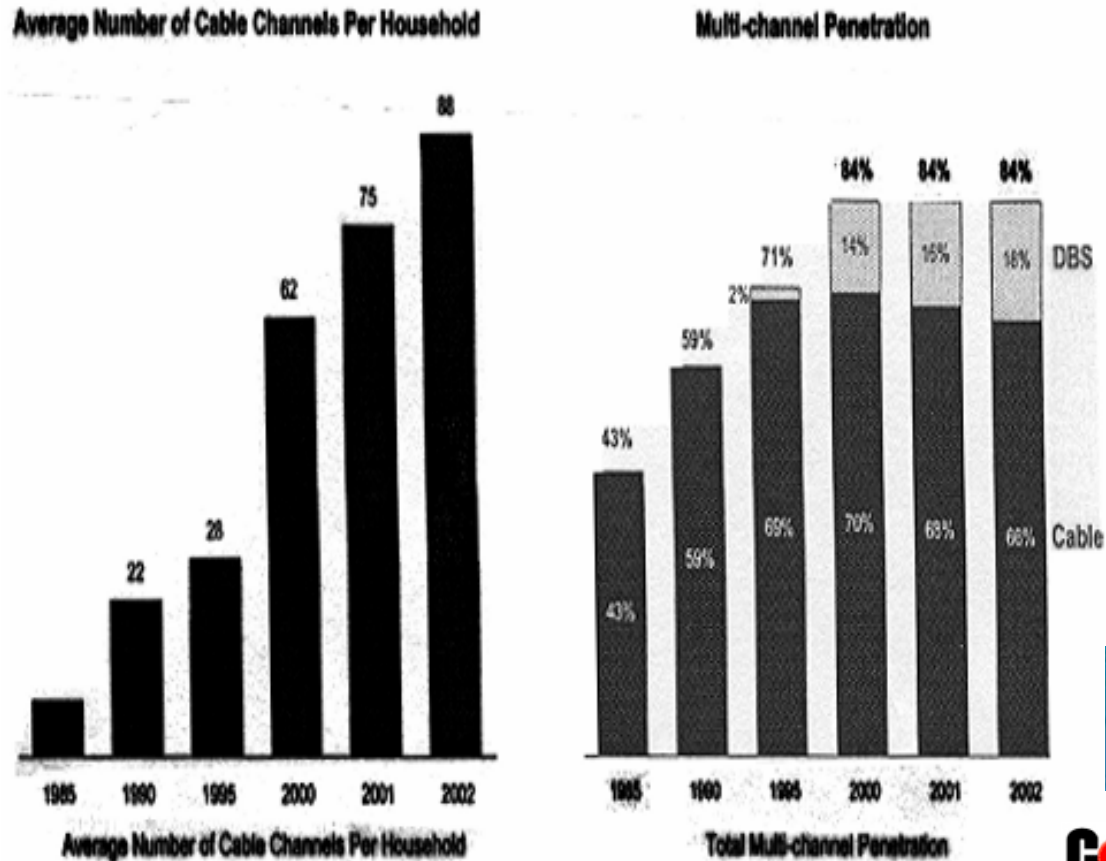
THE CABLE INDUSTRY'S BUNDLING AND TYING STRATEGY AND THE STAKES OF A LA CARTE PROGRAMMING (ESTIMATED FOR 2004)

BUNDLED SERVICES					A LA CARTE SERVICES	TOTAL REV.
Service	Price/ Month	Subs	Channels	Annual Rev.	Service	Rev.
Bundled by policy for social reasons						
Basic	\$15	70m	16	\$13b		\$13b
Unbundled by policy						
					Pay per view	\$1b
Bundled by Cable						
Expanded Basic	\$24	60m	48	\$17b	Premium	\$6b
Tied by cable						\$17b
TRADITIONAL VIDEO						
Digital Tier	\$15	21m	30	\$3b		\$3b
Bundled by Cable						
					VOD	\$1b
Virtually tied by cable						
Cable modem & Internet Service	\$45	16m	na	\$9b		\$9b
Total services						\$49b
Total including equipment, advertising and miscellaneous						\$56b



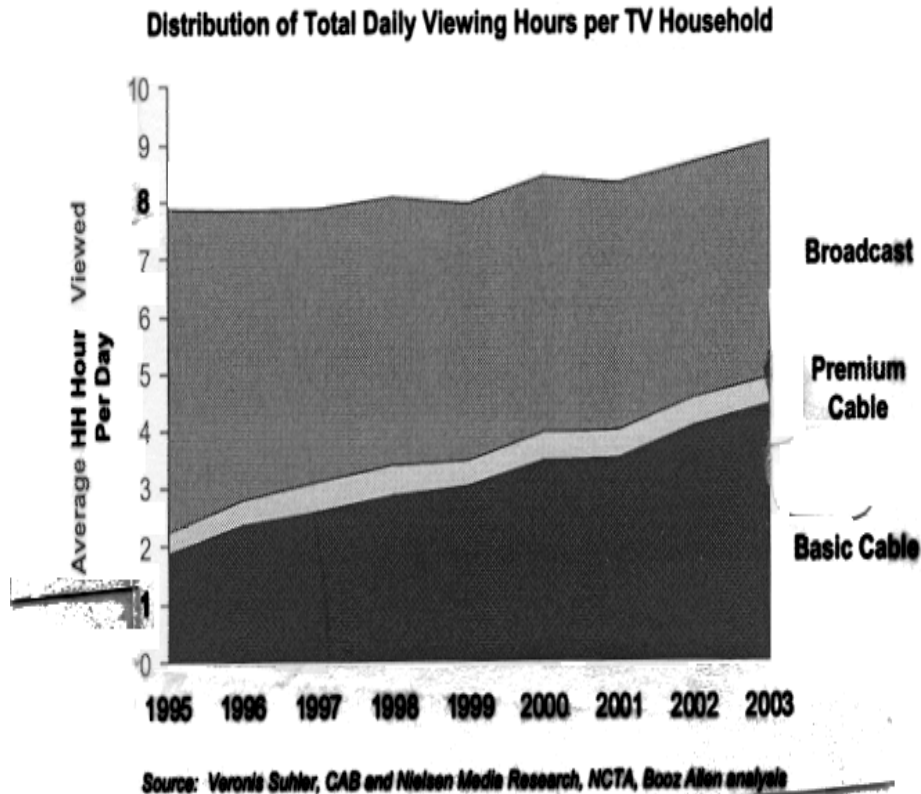
**BECAUSE BUNDLES HAVE GOTTEN SO LARGE,
ADDING CHANNELS NO LONGER DRIVES PENETRATION**

Figure 5: Number of Channels Per Household vs. Multi-channel Penetration



**TOTAL VIEWING ONLY INCREASED SLIGHTLY,
DESPITE BUNDLES BALLOONING BIGGER**

Figure 6: Consumer Viewing by Type of Network

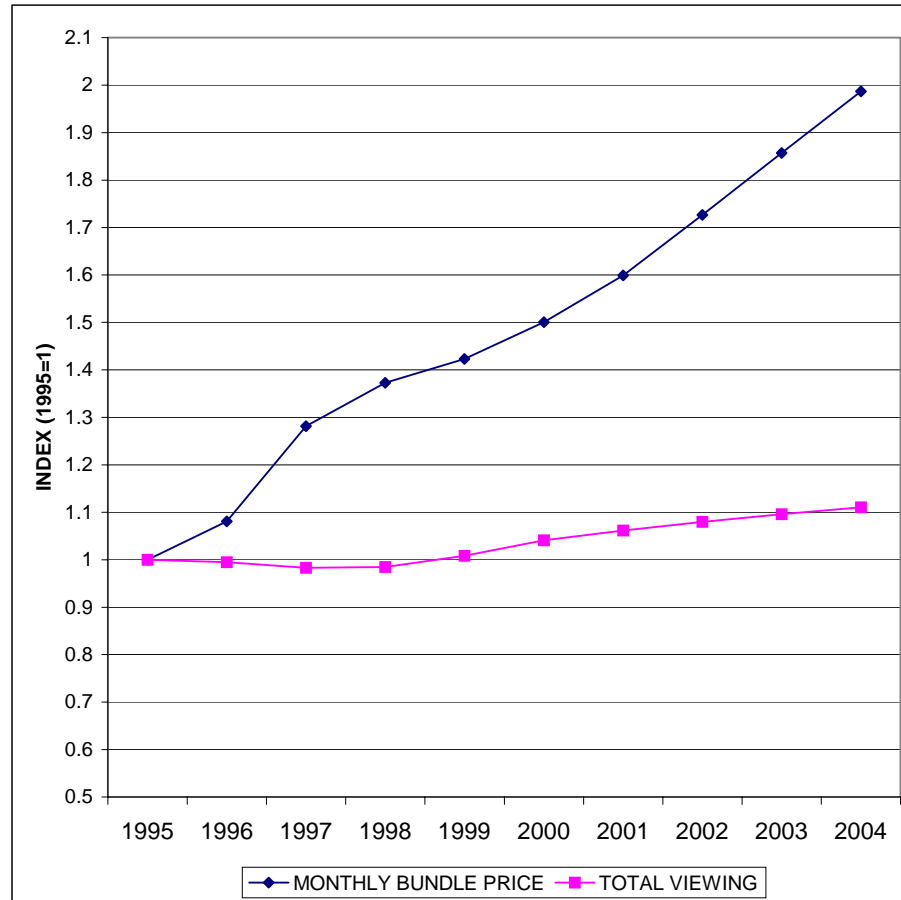


Source: Booz Allen, p. 14.



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BUNDLE PRICES HAVE INCREASED MUCH FASTER THAN VIEWING



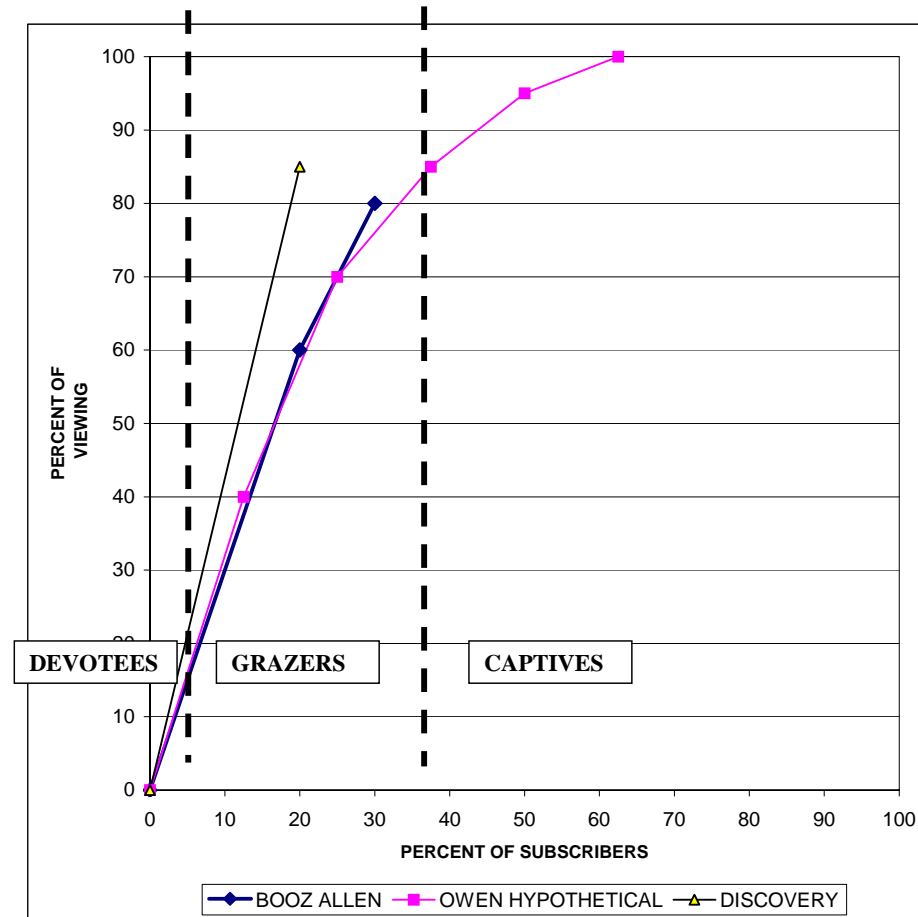
Source: Kagan Associates, *History of Cable TV Subscribers and Revenues*; Federal Communications Commission, *Report on Cable Prices*, various issues; Veronis Suchler Stevenson, *Communications Industry Report Summary*, 2003.



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PERCENT OF A GIVEN NETWORK'S VIEWING BY TYPE OF SUBSCRIBER.

BECAUSE VIEWING IS SO CONCENTRATED, NETWORKS WILL LOSE FEW, IF ANY, VIEWERS UNDER A MIXED BUNDLING APPROACH TO A LA CARTE.

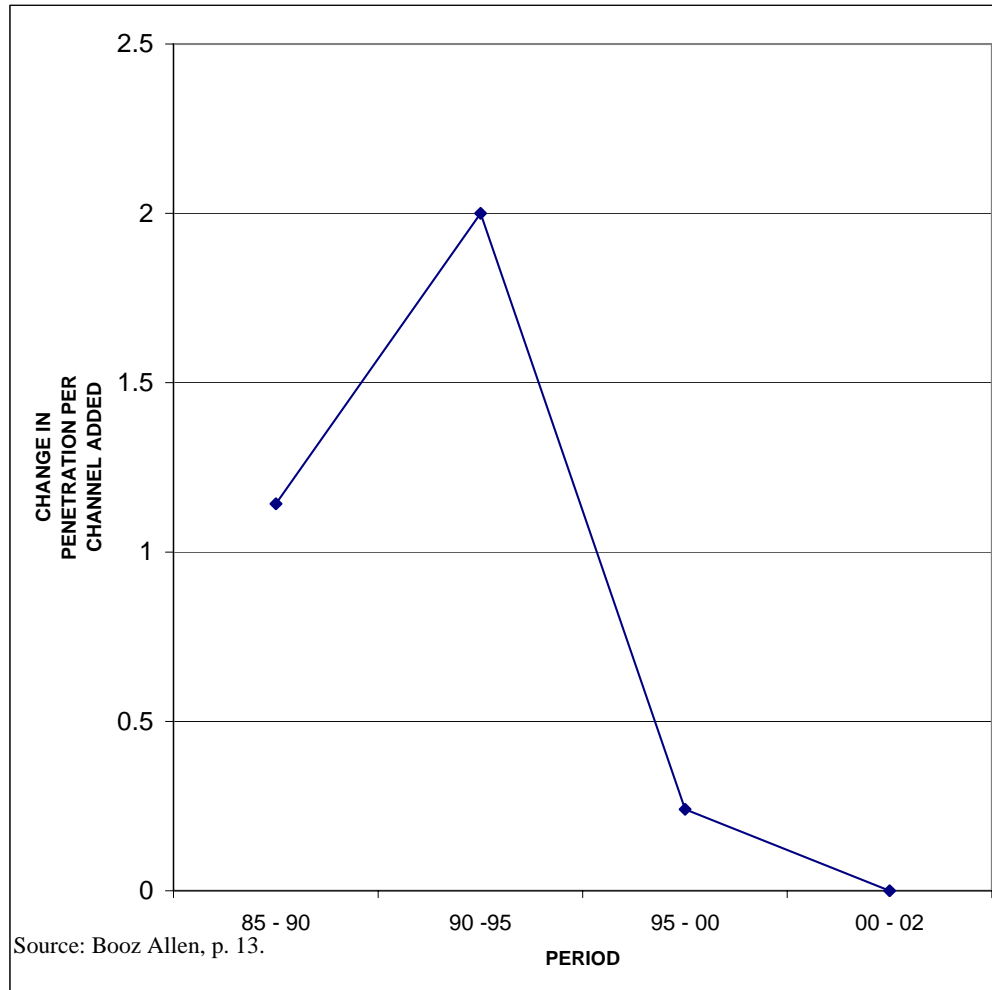


Source: Booz Allen, p. p. 5; Owen and Gale, p. 34; Willig, et. al., p. 17.



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CABLE OPERATORS ADDING NEW CHANNELS DOESN'T DRIVE PENETRATION

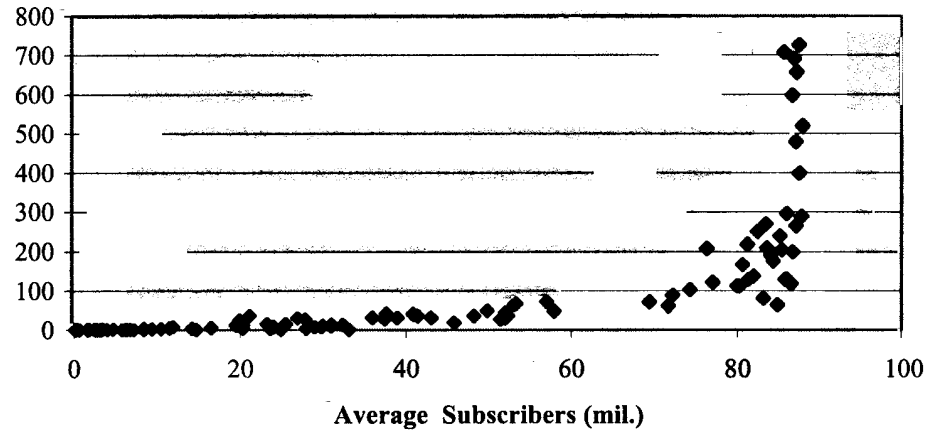


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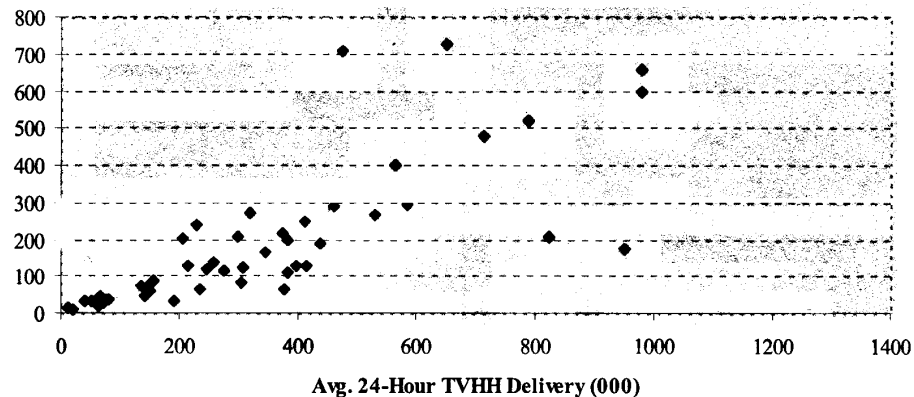
THE TOP 25 NETWORKS ACCOUNT FOR 80% OF AD REVENUES

Figure 1: Network Net Ad Revenue (\$ mil.)



RATINGS ARE MUCH MORE DETERMINANT OF AD REVENUES THAN SUBSCRIBERS

Figure 2: Network Net Ad Revenue (\$ mil.)

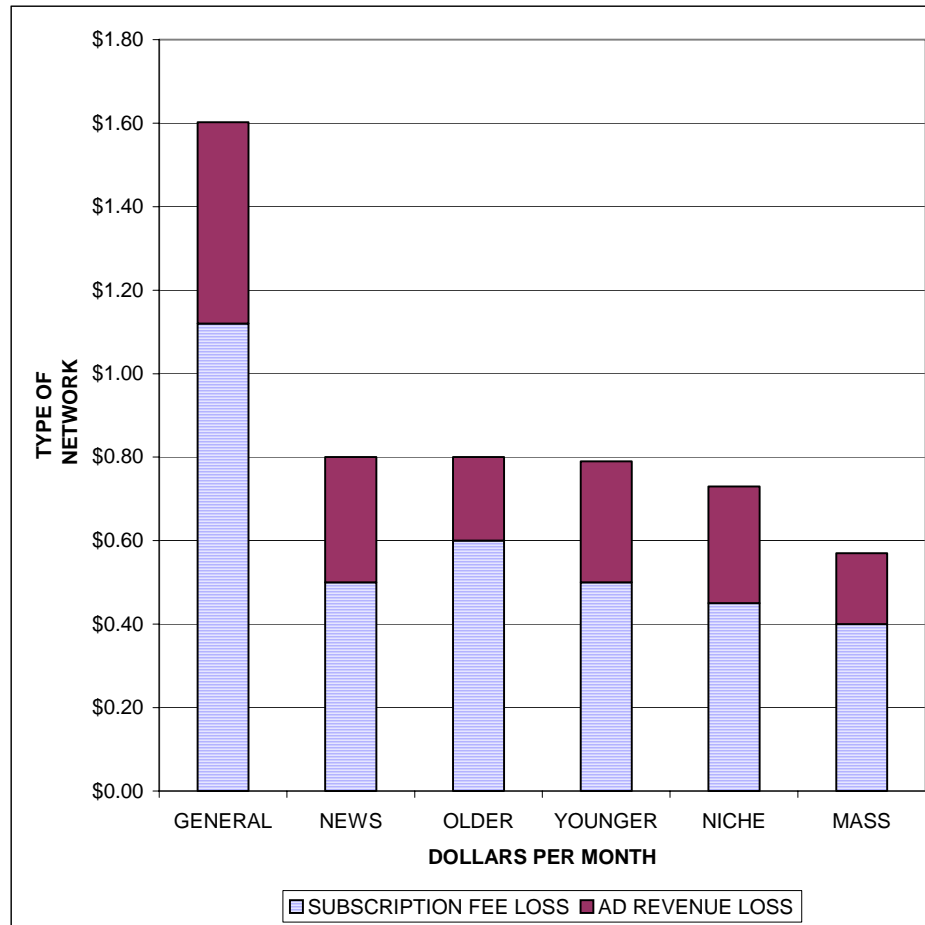


Source: Owen, pp. 32-33.



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RATIONALE ASSUMPTIONS ABOUT REVENUE CHANGES RESULT IN REASONABLE A LA CARTE CHANNEL PRICES

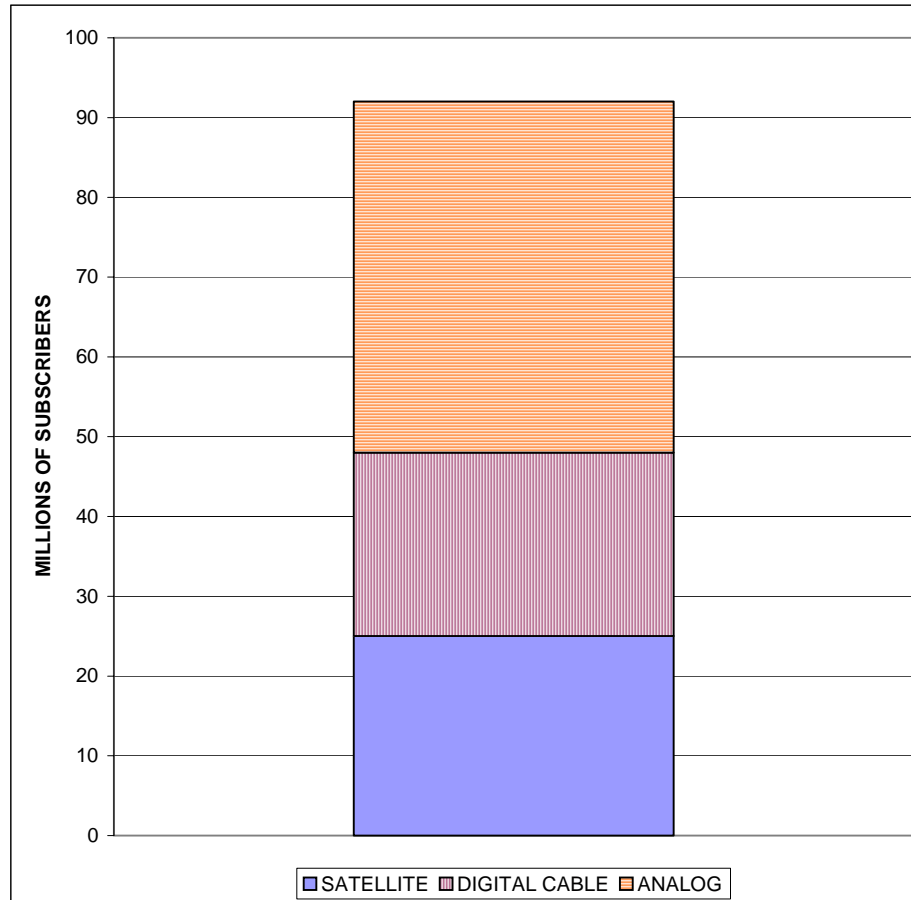


Source: Calculated by Author.



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NEARLY HALF OF MVPD SUBSCRIBERS ARE ALREADY DIGITAL



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